Jim Skinner
All State Legal
Express Port 1, 4422 Dalman Road,
Fort Wayne, IN 46805

Dear Jim Skinner:

Re: Exempt Construction and Operation Status,
003-12505-00316

The application from All State Legal, received on July 19, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following Engraving and Printing Operations, to be located at Express Port 1, 4422 Dalman Road, Fort Wayne, IN 46805, Indiana, is classified as exempt from air pollution permit requirements:

(a) One (1) Engraving press, identified as 2X4 Carver, with a maximum line speed of 2500 feet per minute, and exhausting to the atmosphere.
(b) One (1) Engraving press, identified as 3X8 Cronite, with a maximum line speed of 2500 feet per minute, and exhausting to the atmosphere.
(c) One (1) Engraving press, identified as 5X9 Cronite, with a maximum line speed of 2500 feet per minute, and exhausting to the atmosphere.
(d) One (1) Engraving press, identified as 7X11 Carver, with a maximum line speed of 1000 feet per minute, and exhausting to the atmosphere.
(e) One (1) Printing press, identified as 3302 RYOBI, with a maximum line speed of 10000 feet per minute, and exhausting to the atmosphere.
(f) One (1) Printing press, identified as 3200 RYOBI, with a maximum line speed of 10000 feet per minute, and exhausting to the atmosphere.
(g) One (1) Natural gas fired space heater, identified as Hu-01, with a maximum capacity of 0.2 million BTU per hour, and exhausting to the atmosphere.

The following conditions shall be applicable:

(1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

GS

cc: File – Allen County
Allen County Health Department
Air Compliance – Jennifer Dorn
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	**All State Legal**
Source Location:	**Expressport 1, 4422 Dalman Road, Fort Wayne IN 46805**
County:	**Allen**
SIC Code:	**2752 & 2796**
Operation Permit No.:	**003-12505-00316**
Permit Reviewer:	**Gurinder Saini**

The Office of Air Management (OAM) has reviewed an application from All State Legal relating to the construction and operation of Engraving and Printing Process.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) Engraving press, identified as 2X4 Carver, with a maximum line speed of 2500 feet per minute, and exhausting to the atmosphere.

(b) One (1) Engraving press, identified as 3X8 Cronite, with a maximum line speed of 2500 feet per minute, and exhausting to the atmosphere.

(c) One (1) Engraving press, identified as 5X9 Cronite, with a maximum line speed of 2500 feet per minute, and exhausting to the atmosphere.

(d) One (1) Engraving press, identified as 7X11 Carver, with a maximum line speed of 1000 feet per minute, and exhausting to the atmosphere.

(e) One (1) Printing press, identified as 3302 RYOBI, with a maximum line speed of 10000 feet per minute, and exhausting to the atmosphere.

(f) One (1) Printing press, identified as 3200 RYOBI, with a maximum line speed of 10000 feet per minute, and exhausting to the atmosphere.

(g) One (1) Natural gas fired space heater, identified as Hu-01, with a maximum capacity of 0.2 million BTU per hour, and exhausting to the atmosphere.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

This is the first air approval for this source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
There are no Stacks					

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 19, 2000, with additional information received on August 21, 2000.

Emission Calculations

See Appendix A page 1 through 2 of this document for detailed emissions calculations.

Potential To Emit (of Source or Revision) Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO_2	-
VOC	0.56
CO	0.1
NO_x	0.1

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any criteria pollutant is less than 10 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Allen County.

Pollutant	Status **(attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)**
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Allen County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	-
PM10	-
SO_2	-
VOC	0.56
CO	0.1
NO_x	0.1
Single HAP	-
Combination HAPs	-

(a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ, because the process does not involve Rotogravure printing.

(b) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(c) National Emission Standards for Hazardous Air Pollutants (NESHAPs)

1. 40 CFR § 63.820, Subpart KK – National Emission Standards for the Printing and Publishing Industry.

   This NESHAP applies to each publication rotogravure unit which is a major source of HAPs.

   As this unit is not major source of HAPs, this NESHAP does not apply.

(d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potential to emit any criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Units

326 IAC 8-5-5 (Miscellaneous Operations: Graphics Arts Operation)

The unit is not subject to this rule because it does not operate packaging rotogravure, publication rotogravure, and flexographic printing operation. Therefore this rule does not apply.

Conclusion

The construction and operation of this Engraving and Printing Process shall be subject to the conditions of the attached proposed exemption 003-12505-00316**.**

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Space Heater

Company Name: **All State Legal**
Address City IN Zip: **Expressport 1, 4422 Dalman Road, Fort Wayne, IN 46805**
CP: **003-12505**
Plt ID: **003-00316**
Reviewer: Gurinder Saini
Date: August 23, 2000

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.2	1.8

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.1	0.0	0.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **All State Legal**
Address City IN Zip: **Expressport 1, 4422 Dalman Road, Fort Wayne, IN 46805**
CP: **003-12505**
Plt ID: **003-00316**
Reviewer: Gurinder Saini
Date: August 23, 20(

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Autowash Solution	6.5	99.00%	0.0%	99.0%	0.0%	0.00%	0.02000	1.000	6.39	6.39	0.13	3.07	0.56	0.00		50%

State Potential Emissions **Add worst case coating to all solvents** **0.13** **3.07** **0.56** **0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used